



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 23, 2023

**BY ECF**

The Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Application granted. The Court  
adjourns the Rule 404(b) notice and  
expert notice deadline to March 3,  
2023.

SO ORDERED:  
Date: 2/23/2023

*Richard M. Berman*  
Richard M. Berman, U.S.D.J.

**Re: *United States v. Wilfredo Rosado*, S1 21 Cr. 516 (RMB)**

Dear Judge Berman:

The Government respectfully submits this letter to request that the Court adjourn the Rule 404(b) notice and expert notice (the "Notices") deadline from today until at least March 3, 2023, or the Court's resolution of an anticipated adjournment request from the defense. In light of the Court's order on February 22, 2023, Dkt. 70, the parties have conferred about the issues raised in the defendant's recent letter to the Court, dated February 16, 2023. The Government understands that the defense is considering requesting to adjourn the trial for several months and anticipates that the defense will soon file a letter motion to that effect. The Government will file a written opposition to that motion in advance of the conference.


While the Government is prepared to provide the Notices today, the Government requests that the Court adjourn the Notices deadline until at least the March 3, 2023 conference or the resolution of the defendant's anticipated adjournment motion. The Notices contain sensitive information that implicate the privacy and safety of Government witnesses. If the Court grants the defense's application for an adjournment without adjourning the Notices deadline, the privacy and safety of those individuals will be at risk for months unnecessarily. The defense opposes this request.

February 23, 2023

Page 2

Respectfully submitted,

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cc All counsel, by ECF